

REMARKS

In the Office Action, Examiner rejected claims 4-10 and 14-20 under § 102 as being anticipated by US2002/0032696 issued to Takiguchi et al (Takiguchi). The Examiner allowed claims 1-3 and 11-14. In this Response, Applicants have not amended, deleted, or added any claims. Accordingly, claims 1-20 will be pending after entry of this Response.

I. Claims 4-10

The Examiner rejected claims 4-10 as being anticipated by Takiguchi.

Claims 5-10 are dependent directly or indirectly on independent claim 4. Claim 4 recites a method of organizing digital images in a computer system. This method acquires a first set of digital image files into the computer system during a first single session. The method then marks the first set of digital image files acquired into the computer system during the first single session as a set of related image files.

Applicants respectfully submit that Takiguchi does not disclose, teach, or even suggest such a method. Specifically, Applicants respectfully submit that Takiguchi does not disclose a method that:

- acquires a first set of digital image files into the computer system during a first single session; and
- marks the first set of digital image files acquired into the computer system during the first single session as a set of related image files.

The Examiner identifies Figures 3 and 6 and column 10 paragraph [0185] of Takiguchi as disclosing the limitations of claim 4. The Applicants respectfully traverse. These passages of

Takiguchi disclose a display method for displaying data items/icons on rings representing dates associated with the data items/icons. These data items/icons are retrieved from a file management system or data base system of a computer and displayed on rings based upon the date associated with each data item/icon. See Takiguchi column 4, paragraph [0044]. The date associated with each data item/icon is either a date of creation or a date of correction of the data item/icon. See Takiguchi, column 11 paragraph [0204]. As such, the images are not acquired and marked as relating to a "single session", rather they are retrieved and displayed as relating to a date of creation or correction. Hence, Takiguchi does not account for images acquired during "sessions", but rather accounts for images created or corrected at a specific time. Therefore, Takiguchi does not disclose, teach, or even suggest the method of claim 4, which acquires a first set of digital image files into a computer system during a first single session and marks the first set of digital images as a set of related image files.

Accordingly, Applicants respectfully submit that Takiguchi does not render claim 4 unpatentable. As claims 5-10 are dependent on claim 4, Applicants respectfully submit that claims 5-10 are patentable over Takiguchi for at least the same reasons. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the § 102 rejection of claims 4-10.

II. Claims 14-20

The Examiner rejected claims 14-20 under § 102 as being anticipated by Takiguchi.

Claim 14 is analogous to claim 4, except that claim 14 recites instructions stored on a computer readable medium, whereas claim 4 recites a method. Accordingly, Applicants respectfully submit that claim 14 is patentable over Takiguchi for the same reasons as claim 4.

Moreover, as claims 15-20 are dependent on claim 14, Applicants respectfully submit that claims 15-20 are patentable over Takiguchi for at least the same reasons. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the § 102 rejection of claims 14-20.

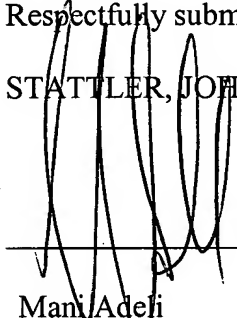
CONCLUSION

In view of the foregoing, it is submitted that all pending claims, namely claims 1-20, are in condition for allowance. Reconsideration of the rejections and objections is requested. Allowance is earnestly solicited at the earliest possible date.

Respectfully submitted,

STATTLER, JOHANSEN & ADELI LLP

Dated: July 19, 2004


Mani Adeli
Reg. No. 39,585

Stattler Johansen & Adeli LLP
PO Box 51860
Palo Alto, CA 94303-0728
Phone: (650) 752-0990 ext.102
Fax: (650) 752-0995